

10 E. Doty St., Suite 600 Madison, Wisconsin 53703-3392 608-286-2302 www.BurnsBair.com

Official Committee of Unsecured Creditors of The Diocese of Rochester, New York

Bill #: 01075

3/17/2023

Issue Date :

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	Narrative	<u>Hours</u>	<u>Amount</u>
2/1/2023	Jesse Bair	Review correspondence from I. Scharf re Debtor Plan (.1);	0.10	\$62.50
2/1/2023	Timothy Burns	Meet with L. Au re potential direct claims against the Diocese's insurers (.1); review correspondence from state court counsel re meeting to discuss settlement issues (.2); prepare for state court counsel meeting re settlement issues (.8); meet with J. Bair re same (.2); attend call (1.0); review email re mediator selection (.1);	2.40	\$1,680.00
2/1/2023	Leakhena Au	Participate in conference with N. Kuenzi re changes to direct action claim approach and implementation of same in draft memorandum (.4);	0.40	\$168.00
2/1/2023	Nathan Kuenzi	Participate in conference with L. Au re changes to direct action claim approach and implementation of same in draft memorandum (.4);	0.40	\$168.00
2/1/2023	Nathan Kuenzi	Outline potential revisions to memorandum re potential direct claims against the Diocese's insurers (.1);	0.10	\$42.00
2/1/2023	Jesse Bair	Conference with T. Burns re insurance strategy in preparation for upcoming state court counsel call (.2); draft insurance exposure summary in connection with same (.1);	0.30	\$187.50
2/1/2023	Jesse Bair	Participate in portion of state court counsel meeting re settlement issues (.6); post-call analysis re potential next steps (.2);	0.80	\$500.00
2/2/2023	Alyssa Turgeon	Assist in revising memorandum re potential direct claims against the Diocese's insurers (2.0);	2.00	\$720.00
2/2/2023	Jesse Bair	Participate in conference with T. Burns re insurance strategy (.1);	0.10	\$62.50
2/2/2023	Timothy Burns	Participate in conference with J. Bair re insurance strategy (.1);	0.10	\$70.00

2/3/2023	Jesse Bair	Review information about potential stipulated judgment mediators (.2); correspondence with I. Scharf re joint stipulation re stipulated judgment mediator (.1); review Debtor email re potential stipulated judgment mediators (.1);	0.40	\$250.00
2/3/2023	Alyssa Turgeon	Continue assisting in revising memorandum re potential direct claims against the Diocese's insurers (1.0);	1.00	\$360.00
2/3/2023	Timothy Burns	Review example of joint stipulation re stipulated judgment mediator (.1); review correspondence with J. Bair and I. Scharf re same (.1);	0.20	\$140.00
2/6/2023	Jesse Bair	Participate in internal BB team conference re case status and associated research projects (.1);	0.10	\$62.50
2/6/2023	Jesse Bair	Review I. Scharf correspondence to the Committee re case update (.1);	0.10	\$62.50
2/6/2023	Timothy Burns	Participate in BB team meeting re case developments and related assignments (.1);	0.10	\$70.00
2/6/2023	Nathan Kuenzi	Participate in team meeting re status of case and related assignments (.1);	0.10	\$42.00
2/6/2023	Leakhena Au	Participate in BB team meeting re case developments and related assignments (.1);	0.10	\$42.00
2/6/2023	Alyssa Turgeon	Participate in team meeting re status of case and related assignments (.1);	0.10	\$36.00
2/6/2023	Nathan Kuenzi	Analyze revisions to memorandum re potential direct claims against the diocese's insurers (.3); supplemental research re same (.3);	0.60	\$252.00
2/6/2023	Brian Cawley	Participate in team meeting regarding case status and assignments (.1);	0.10	\$42.00
2/7/2023	Timothy Burns	Analysis re potential Plan revisions (.1);	0.10	\$70.00
2/7/2023	Timothy Burns	Review email from I. Scharf to state court counsel re state court counsel meeting (.1);	0.10	\$70.00
2/7/2023	Timothy Burns	Review email from I. Scharf and meet with J. Bair re First State's offer (.1);	0.10	\$70.00
2/7/2023	Nathan Kuenzi	Continue drafting revisions to memorandum re potential direct claims against the Diocese's insurers (.6);	0.60	\$252.00
2/7/2023	Jesse Bair	Analyze First State counter offer and assess potential response to same (.2);	0.20	\$125.00
2/7/2023	Jesse Bair	Correspondence with I. Scharf re the Diocese's draft Plan (.1);	0.10	\$62.50
2/8/2023	Jesse Bair	Review and assess insurance-related Plan edits suggested by state court counsel (.2);	0.20	\$125.00
2/8/2023	Jesse Bair	Correspondence with I. Scharf re potential response to First State counter (.1);	0.10	\$62.50
2/8/2023	Jesse Bair	Participate in conference with T. Burns re Plan-related issues (.1); participate in supplemental conference with T. Burns re settlement procedures (.1);	0.20	\$125.00
2/8/2023	Jesse Bair	Participate in state court counsel meeting re ongoing case issues (.3);	0.30	\$187.50
2/8/2023	Timothy Burns	Participate in state court counsel meeting re ongoing case issues (.3);	0.30	\$210.00

2/8/2023 Timothy Burns	Review email from state court counsel re settlement procedures (.1); meet with J. Bair re same (.1); review email from PSZJ re same (.1); review emails between BB and PSZJ re First State settlement offers and counteroffers (.1); participate in conference re plan issues with J. Bair (.1);	0.50	\$350.00
2/9/2023 Brenda Horn	Draft BB's third interim fee application (2.3); correspond with J. Bair re same (.1);	2.40	\$864.00
2/9/2023 Jesse Bair	Provide instructions to B. Horn re preparing BB's third interim fee application (.1);	0.10	\$62.50
2/9/2023 Jesse Bair	Review correspondence from I. Scharf re additional individuals proposed by the Debtor as potential stipulated judgment mediators (.1);	0.10	\$62.50
2/10/2023 Jesse Bair	Review and edit draft joint Plan received from the Diocese (6.2); participate in conference with T. Burns re draft Plan (.2);	6.40	\$4,000.00
2/10/2023 Jesse Bair	Review correspondence from state court counsel re additional potential stipulated judgment mediator candidates (.1);	0.10	\$62.50
2/10/2023 Timothy Burns	Meet with J. Bair re draft plan (.2);	0.20	\$140.00
2/11/2023 Timothy Burns	Review correspondence between state court counsel and committee professionals re stipulated judgment mediator selection (.1);	0.10	\$70.00
2/13/2023 Timothy Burns	Review and revise draft plan (.8);	0.80	\$560.00
2/13/2023 Jesse Bair	Participate in state court counsel meeting re stipulated judgment and Plan issues (.6);	0.60	\$375.00
2/14/2023 Timothy Burns	Participate in call with J. Bair re outcome of recent state court counsel meeting (.1);	0.10	\$70.00
2/14/2023 Jesse Bair	Conference with T. Burns re outcome of recent state court counsel meeting (.1);	0.10	\$62.50
2/15/2023 Jesse Bair	Review I. Scharf correspondence re case update (.1);	0.10	\$62.50
2/15/2023 Timothy Burns	neutrality of plan (.2);	0.20	\$140.00
2/16/2023 Jesse Bair	Review correspondence with state court counsel re recent settlement in another Diocesan bankruptcy case (.1);	0.10	\$62.50
2/20/2023 Jesse Bair	Review correspondence with I. Scharf and state court counsel re case update (.1);	0.10	\$62.50
2/21/2023 Leakhena Au	Participate in conference with N. Kuenzi re research status re potential direct claims against the Diocese's insurers (.2);	0.20	\$84.00
2/21/2023 Nathan Kuen:	Participate in conference with L. Au re research status re potential direct claims against the Diocese's insurers (.2);	0.20	\$84.00
2/21/2023 Timothy Burns	Brief review of insurer's discovery motions to state court counsel (.3); meet with J. Bair re same (.1);	0.40	\$280.00
2/21/2023 Jesse Bair	Review CNA's Rule 2004 motion to compel litigation financing agreements (.3);	0.30	\$187.50
2/21/2023 Jesse Bair	Review CNA's motion to compel Rule 2019 disclosures (.4);	0.40	\$250.00

Jesse Bair	re Plan analysis for insurance purposes (3.5); reviewed and responded to email from I. Scharf re Committee meeting re plan and insurance issues (.1); correspondence with J. Bair re same (.1); Review agenda for upcoming Committee meeting (.1); correspondence with T. Burns re insurance issues in connection with same (.1);	0.20	\$125.00
	and responded to email from I. Scharf re Committee meeting re plan and insurance issues (.1);		
Timothy Burns	Analyze case law re good faith requirement and TDPs	3.70	\$2,590.00
Jesse Bair	Review correspondence from I. Scharf re Plan and litigation update (.1);	0.10	\$62.50
	Plan (.1);		\$62.50
Timothy Burns	Correspondence with J. Bair re Plan draft status (.1);	0.10	\$70.00
Leakhena Au	Continue analysis re potential direct claims against the Diocese's insurers (.1);		\$42.00
Timothy Burns			\$70.00
Jesse Bair	Review correspondence re further adjournment of Diocese claims objections (.1);		\$62.50
Jesse Bair	Review CNA notice of adjournment of recently filed motions to compel (.1);	0.10	\$62.50
Timothy Burns	and 2019 motion (.1); review claims objection adjournment letter brief (.1); review email from I. Scharf re 2004 and 2019 papers (.1); detailed review of CNA's recent discovery motions (1.2);		\$1,050.00
	its claims objections (.1);		·
	counsel re CNA's recent motions to compel (.1);		\$62.50
Josep Bair		0.10	\$62.50
Jesse Bair	Participate in conference with T. Burns re CNA's recent	0.10	\$62.50
	Jesse Bair Jesse Bair Timothy Burns Jesse Bair Timothy Burns Leakhena Au Timothy Burns Jesse Bair Jesse Bair	motions to compel (.1); Jesse Bair Review I. Scharf correspondence with state court counsel re CNA's recent motions to compel (.1); Jesse Bair Review the Debtor's letter to the court further adjourning its claims objections (.1); Timothy Burns Review email from state court counsel re 2004 Request and 2019 motion (.1); review claims objection adjournment letter brief (.1); review email from I. Scharf re 2004 and 2019 papers (.1); detailed review of CNA's recent discovery motions (1.2); Jesse Bair Review CNA notice of adjournment of recently filed motions to compel (.1); Jesse Bair Review correspondence re further adjournment of Diocese claims objections (.1); Timothy Burns Additional analysis re CNA's discovery motions (.1); Continue analysis re potential direct claims against the Diocese's insurers (.1); Correspondence with J. Bair re Plan draft status (.1); Correspondence with T. Burns re status of Rochester Plan (.1); Jesse Bair Review correspondence from I. Scharf re Plan and litigation update (.1); Timothy Burns Analyze case law re good faith requirement and TDPs	motions to compel (.1); Jesse Bair Review I. Scharf correspondence with state court counsel re CNA's recent motions to compel (.1); Jesse Bair Review the Debtor's letter to the court further adjourning its claims objections (.1); Timothy Burns Review email from state court counsel re 2004 Request and 2019 motion (.1); review claims objection adjournment letter brief (.1); review email from I. Scharf re 2004 and 2019 papers (.1); detailed review of CNA's recent discovery motions (1.2); Jesse Bair Review CNA notice of adjournment of recently filed motions to compel (.1); Jesse Bair Review correspondence re further adjournment of Diocese claims objections (.1); Timothy Burns Additional analysis re CNA's discovery motions (.1); Continue analysis re potential direct claims against the Diocese's insurers (.1); Correspondence with J. Bair re Plan draft status (.1); Jesse Bair Correspondence with T. Burns re status of Rochester Plan (.1); Jesse Bair Review correspondence from I. Scharf re Plan and litigation update (.1); Timothy Burns Analyze case law re good faith requirement and TDPs 3.70

EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
2/1/2023	Postage	\$7.74
2/6/2023	CloudNine, database monthly hosting fee (January 2023)	\$47.13
2/23/2023	Postage	\$4.35
Total Expenses		\$59.22

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	3.10	\$360.00	\$1,116.00
Brenda Horn	2.40	\$360.00	\$864.00
Brian Cawley	0.10	\$420.00	\$42.00

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jesse Bair	12.30	\$625.00	\$7,687.50
Leakhena Au	0.80	\$420.00	\$336.00
Nathan Kuenzi	2.00	\$420.00	\$840.00
Timothy Burns	11.10	\$700.00	\$7,770.00

Total Due This Invoice: \$18,714.72